

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MASSACHUSETTS

In re

NICHOLAS J. FIORILLO

Debtor

)
) Chapter 7, No. 10-44179-MSH
)
)
)
)
)
)

**CHAPTER 7 TRUSTEE'S MOTION TO EXTEND TIME TO
OBJECT TO DEBTOR'S DISCHARGE**

Now comes JONATHAN R. GOLDSMITH ("Trustee"), the duly appointed, qualified and acting Chapter 7 Trustee in the above-captioned proceeding, and moves this Honorable Court for an Order extending the time for objecting to the Debtor's discharge. In support of said Motion, the Trustee respectfully represents as follows:

1. That on August 23, 2010, the above-named Debtor filed a Voluntary Petition under the provisions of Chapter 7 of the Bankruptcy Code.

2. That on October 7, 2010, JONATHAN R. GOLDSMITH accepted the appointment as Chapter 7 Trustee for the above-entitled estate.

3. The Section original 341 Meeting of Creditors in this case was held on November 2, 2010, the 341 was continued and held on December 8, 2010. Pursuant to Fed R. Bankr. P. 4004(a), the deadline for filing objections to the Debtor's discharge is January 3, 2010.

4. The Trustee states that after reviewing certain financial information provided by the Debtor, he has concerns with respect to certain pre-petition financial/real estate transactions undertaken by the Debtor. Accordingly, the Trustee hereby requests an extension of the deadline for filing objections to discharge until March 4, 2011.

WHEREFORE, the Trustee respectfully requests that the date for the Trustee to object to the Debtor's discharge be extended to March 4, 2011, and for other and further relief as the Court deems just and proper.

JONATHAN R. GOLDSMITH, TRUSTEE IN
BANKRUPTCY FOR NICHOLAS J. FIORILLO

Dated: December 21, 2010

By: 

JONATHAN R. GOLDSMITH, ESQ.
(BBO No. 548285)

LAW OFFICE OF JONATHAN R. GOLDSMITH
AND ASSOCIATES, LLC
1350 Main Street, Suite 1505
Springfield, MA 01103
Tel. (413) 747-0700

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MASSACHUSETTS

In re)
)
)
NICHOLAS J. FIORILLO)
)
Debtor)
_____)

Chapter 7, No. 10-44179-MSH

CERTIFICATE OF SERVICE

I, JONATHAN R. GOLDSMITH, ESQ., of the LAW OFFICE OF JONATHAN R. GOLDSMITH AND ASSOCIATES, LLC, 1350 Main Street, Suite 1505, Springfield, Massachusetts, do hereby certify that I have served a copy of the within Motion to Extend Time to Object to Debtor's Discharge upon those parties listed below by electronic mail or by mailing, first class mail, postage prepaid, on this 21st day of December, 2010:

OFFICE OF THE U.S. TRUSTEE
446 Main Street, 14th Floor
Worcester, MA 01608

NICHOLAS J. FIORILLO
49 Olde Colony Drive
Shrewsbury, MA 01545

James P. Ehrhard, Esq.
EHRHARD & ASSOCIATES, P.C.
418 Main Street, 4th Floor
Worcester, MA 01608

/s/ Jonathan R. Goldsmith
JONATHAN R. GOLDSMITH, ESQ.